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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

PLAINTIFF,

SI-4:19-CR0770-HEA

ANTHONY LEMICKI,

DEFENDANT.

Defense Response to the Government's
Motion in Limine to Exclude Proposed Defense
Witness List

Comes now the defendant, pro-se (Hereinafter
Mr. Lemicki) a Federal pre-trial inmate presently
housed in Ste. Genevieve, Mo in the Eastern
District of Missouri, files this response.

The defendant received the Government's
Motion in Limine requesting the Court to prohibit
Mr. Lemicki, and his stand-by-counsel from calling
witnesses that were listed in the Request to
Subpoena Witnesses (ISPS 205). In the Motion, the
Government outlined why the testimony should be

excluded, this is Mr. Lemicy's reply.

Even though I have had a suppression hearing my stand-by-counsel did not advise or assist me with calling witnesses or even getting documents admitted to substantiate my argument. The questions that I would like to ask go beyond what I listed in the Motion.

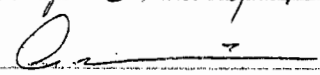
1) The Government moves to exclude Investigator Donga Jackson, as the investigator for the Government, Mrs. Jackson has had a hand in the complete process of the case-in-chief, so she has first hand knowledge of the investigation, and the evidence at hand, so her testimony is relevant to my defense, and not just the search warrant.

2) In regard to Detective Wilfred, the Government ask that any testimony surrounding the legality of the search warrant be excluded. It is my constitutional right to present a full picture to my peers that hold my freedom in their hands. For the Government to try and limit my questions to me is a violation of my constitutional rights.

3) The Government request that special agent Mr. Wick Harnice be excluded from testifying due to his testimony having no relevance to the case-in-chief. A city of St. Louis detective utilized the software at the USSS field office instead of applying for a valid Federal search warrant. The jury needs to hear all the evidence, not just what the Government feels is important.

4) Mr. Radefeld, after 2 long years finally paid me a visit here at the jail, and during our conversation he objected as well to Mr. Lemicy calling Judge Mensah, and Judge Bryant to testify at the trial, his reason where that Mr. Lemicy could get the same answers from Mrs. Donya Jackson, and Mr. David Wilterd that he could from both of the Judges. Mr. Radefeld said that he will not subpoena the judges.

For the foregoing reasons the Defendant prays that the Court allow the mentioned parties to testify.

Respectfully submitted


Anthony Lemicy 72889
5 Basler Drive
Ste. Genevieve, MO 63670

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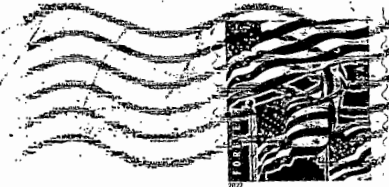
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Honorable Judge
Mr. Antezy - Court Clerk - 10th floor
111 S. 10th Street
St. Louis, MO 63102

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